

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

SAMSUNG ELECTRONICS CO., LTD.
and LG ELECTRONICS CO., LTD.,
Plaintiffs,

v.

PETTERS GROUP WORLDWIDE, LLC,
POLAROID CORPORATION, and
WESTINGHOUSE DIGITAL
ELECTRONICS, LLC,

Defendants.

C.A. No. 08-348-GMS

Judge Gregory M. Sleet

DECLARATION OF DAVID BAER

Pursuant to 28 U.S.C. Section 1746, the undersigned declares, under penalty of perjury, as follows:

1. My name is David Baer, and I am Chief Legal Officer of Petters Group Worldwide, LLC ("Petters"). I am a member of the Bar of the State of Minnesota, and I have served as Chief Legal Officer of Petters for approximately 5 years. My responsibilities include overseeing substantially all of Petters' legal operations. I make this declaration based on my personal knowledge of matters, and based upon my review of pertinent files and/or information provided to me by others upon whom I rely.

2. Petters is a privately held, limited liability company organized under the laws of the State of Delaware with its principal place of business at 4400 Baker Road, Minnetonka, Minnesota 55343.

3. Petters is an investment company that is the parent of various companies around the world, including defendant Polaroid Corporation ("Polaroid"). Petters is a separate legal entity from Polaroid.

4. Petters does not make, use, sell, offer to sell, or import any of the following:
- (i) televisions, including LCD televisions, DVD/television combinations, plasma televisions, and projection screen televisions;
 - (ii) television tuners, including tuner cards;
 - (iii) set-top boxes capable of receiving terrestrial broadcast television; and
 - (iv) video recorders with tuners, including DVD recorders and digital video recorders (DVRs).
5. Petters does not make, use, sell, offer to sell, or import products that are capable of receiving digital ATSC television signals.

Executed this 3 day of September, 2008.


David Baer